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10 **UNITED STATES BANKRUPTCY COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12 **SAN FRANCISCO DIVISION**

12 **In re:**

13 **PG&E CORPORATION,**

14 **- and -**

15 **PACIFIC GAS AND ELECTRIC**  
16 **COMPANY,**

17 **Debtors.**

18 ☐ Affects PG&E Corporation

19 ☐ Affects Pacific Gas and Electric Company

☒ Affects both Debtors

20 *\* All papers shall be filed in the Lead Case, No.*  
21 *19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REPORT ON**  
**RESPONSES TO NINETY-NINTH**  
**THROUGH ONE HUNDRED THIRD**  
**OMNIBUS OBJECTIONS TO CLAIMS AND**  
**REQUEST FOR ORDERS BY DEFAULT AS**  
**TO UNOPPOSED OBJECTIONS**

[Re: Dkt. Nos. 11111, 11114, 11117, 11120, and  
11123]

**Regarding Objections Set for Hearing**  
**September 29, 2021, at 10:00 a.m. (Pacific**  
**Time)**

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as  
3 debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the  
4 above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule  
5 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District  
6 of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing*  
7 *Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Dkt No. 1996] (“**Case**  
8 **Management Order**”), that the Court enter orders by default on the following five omnibus claims  
9 objections (collectively, the “**Omnibus Objections**”):

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<b>Docket Number</b>	<b>Omnibus Objection</b>
11 11111	<i>Reorganized Debtors’ Ninety-Ninth Omnibus Objection to Claims (Books and Records Claims / Satisfied Claims / No Liability Claims / Passthrough Claims)</i> (the “ <b>Ninety-Ninth Omnibus Objection</b> ”)
12 11114	<i>Reorganized Debtors’ One Hundredth Omnibus Objection to Claims (Third-Party Claims)</i> (the “ <b>One Hundredth Omnibus Objection</b> ”)
13 11117	<i>Reorganized Debtors’ One Hundred First Omnibus Objection to Claims (Duplicative and Incorrect Claims)</i> (the “ <b>One Hundred First Omnibus Objection</b> ”)
14 11120	<i>Reorganized Debtors’ One Hundred Second Omnibus Objection to Claims (No Legal Liability Claims)</i> (the “ <b>One Hundred Second Omnibus Objection</b> ”)
15 11123	<i>Reorganized Debtors’ One Hundred Third Omnibus Objection to Claims (ADR No Liability Claims)</i> (the “ <b>One Hundred Third Omnibus Objection</b> ”)

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20 **RELIEF REQUESTED IN THE OMNIBUS OBJECTIONS**

21 The Omnibus Objections seek to either (a) disallow and/or expunge or (b) allow in reduced  
22 amounts the Proofs of Claim listed in Exhibits 1-4 to the Ninety-Ninth Omnibus Objection,  
23 Exhibits 1-3 to the One Hundredth Omnibus Objection, and Exhibit 1 to each of other three Omnibus  
24 Objections.

25 **NOTICE AND SERVICE**

26 The Reorganized Debtors filed a Notice of Hearing with respect to each Omnibus Objection  
27 [Docket Nos. 11113, 11116, 11119, 11122, and 11125]. The Omnibus Objections also were supported  
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by the respective declarations of Robb McWilliams [Docket Nos. 11112, 11118, and 11124], Renee Records [Docket No. 11115], and A. Anna Capelle [Docket No. 11121]. The Omnibus Objections, the Notices of Hearing, and the Declarations were served as described in the *Certificate of Service of Sonia Akter*, filed on August 25, 2021 [Docket No. 11156], each holder of a claim listed on Exhibits 1-4 to the Ninety-Ninth Omnibus Objection, Exhibits 1-3 to the One Hundredth Omnibus Objection, and Exhibit 1 to each of the other three Omnibus Objections received a notice customized to include (i) the claim number, debtor, claim amount and priority, and the basis for Reorganized Debtors' objection with respect to the applicable claim to be disallowed and/or expunged or allowed in a reduced amount, and, if applicable (ii) the claim number, claim amount and priority of the surviving claim for each counterparty.

The deadline to file responses or oppositions to the Omnibus Objections has passed. The Reorganized Debtors have received the following formal and informal responses:

Docket No.	Claimant	Claim No.	Resolution
<b>Ninety-Ninth Omnibus Objection</b>			
Informal	Valley Clean Energy Alliance	65788	The Ninety-Ninth Omnibus Objection is SUSTAINED with respect to this Claim.
<b>One Hundred First Omnibus Objection</b>			
Informal	Gonsalves, Lorraine	87242	The informal response received from the Claimant does not refer to this Claim. However, in an abundance of caution, the One Hundred First Omnibus Objection is going forward on a contested basis with respect to this Claim at the September 29, 2021, Omnibus Hearing.
<b>One Hundred Second Omnibus Objection</b>			
11239	Weidman, III, Wm. F.	10281	The One Hundred Second Omnibus Objection is going forward on a contested basis with respect to this Claim at the September 29, 2021, Omnibus Hearing.

Docket No.	Claimant	Claim No.	Resolution
<b>One Hundred Third Omnibus Objection</b>			
Informal	Gonsalves, Lorraine	81398	The One Hundred Third Omnibus Objection is going forward on a contested basis with respect to this Claim at the September 29, 2021, Omnibus Hearing.

### **DECLARATION OF NO OPPOSITION RECEIVED**

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am an attorney with the law firm of Keller Benvenuti Kim LLP, co-counsel for the Reorganized Debtors.
2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no responses have been filed with respect to the Omnibus Objections except as described herein.
3. This declaration was executed in Sunnyvale, California.

WHEREFORE, the Reorganized Debtors hereby request entry of Orders (i) disallowing and/or expunging or (ii) allowing in a reduced amount the Proofs of Claim listed in **Exhibit 1**<sup>1</sup> to this Request, which listed Claims are identical to those listed in Exhibits 1-4 to the Ninety-Ninth Omnibus Objection, Exhibits 1-3 to the One Hundredth Omnibus Objection, and Exhibit 1 to each of the other three Omnibus Objections, except as otherwise discussed above.

Dated: September 22, 2021

**KELLER BENVENUTTI KIM LLP**

By: /s/ Thomas B. Rupp  
Thomas B. Rupp

*Attorneys for Debtors and Reorganized Debtors*

<sup>1</sup> The portions of **Exhibit 1** listing Claims to be expunged pursuant to the One Hundred Third Omnibus Objection have been redacted in accordance with the *Order Granting Motion to Redact Documents Filed in Support of Reorganized Debtors' Omnibus Objection to Claims*, entered on August 23, 2021 [Docket No. 11137]. Unredacted versions for the Court's review will be filed under seal.